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**From:** Wayne Miller [Miller.Wayne@azdeq.gov]  
**Sent:** 6/8/2016 9:56:15 PM  
**To:** d'Almeida, Carolyn K. [dAlmeida.Carolyn@epa.gov]  
**Subject:** 2016-6-8 - wafb - issue without ADEQ - if time is of essence - Agency concern - arsenic as NA2SO4 injection by product - ST012 EBR -

Please issue without ADEQ if time is of essence. I have not received management support for stop work, at this time. Leadership is dealing with internal deadlines (other issues) and WAFB ST012 stop work support consensus may not be unanimous. However, I can support an Agency concern that remediation may generate arsenic/pollutant concerns.

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**From:** d'Almeida, Carolyn K. [mailto:dAlmeida.Carolyn@epa.gov]  
**Sent:** Wednesday, June 08, 2016 12:09 PM  
**To:** Davis, Eva <Davis.Eva@epa.gov>  
**Cc:** Wayne Miller <Miller.Wayne@azdeq.gov>  
**Subject:** 2016-6-8 - wafb - Agency concern - arsenic as NA2SO4 injection by product - ST012 EBR -

Eva

Are you still adding to this letter or is it final? I think we need to get a response out soon. The letter from AF yesterday has already elevated this to my Branch Chief and I will be talking to her in an hour. I am thinking we send one more letter at our level regarding the arsenic concern, and our inability to approve the workplan until concerns are resolved: 1) the NAPL mass is quantified 2) the amount of amendment and what it would do to the groundwater is known. Possibly indicate we are elevating this issue and may be forced to invoke stop work order under the FFA if our concerns are not resolved.

Wayne,  
does ADEQ want to be a signatory to that letter?

Carolyn

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**From:** Davis, Eva  
**Sent:** Tuesday, June 07, 2016 7:19 AM  
**To:** d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>  
**Cc:** Wayne Miller <Miller.Wayne@azdeq.gov>  
**Subject:** RE: arsenic injection

Here's a draft of what I have – hope to get it out today, hoping to hear something back from Wayne about arsenic injection

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**From:** d'Almeida, Carolyn K.  
**Sent:** Monday, June 06, 2016 3:06 PM  
**To:** Davis, Eva <Davis.Eva@epa.gov>; Wayne Miller <Miller.Wayne@azdeq.gov>  
**Subject:** RE: arsenic injection

.... And I understand AZ already has natural background As in groundwater issue in many places, Wayne do you know what background As is at Williams?

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**From:** d'Almeida, Carolyn K.  
**Sent:** Monday, June 06, 2016 1:03 PM  
**To:** Davis, Eva <[Davis.Eva@epa.gov](mailto:Davis.Eva@epa.gov)>  
**Subject:** RE: arsenic injection

This comment needs to be made. Another potential factor in the J&S comment I made to amec on the last BCT call, if done without agency approval. Incidentally, my attorney advised me that if need be, I can go to my DD and get a stop work order issued for the EBR portion if we think there is a problem.

Carolyn

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**From:** Davis, Eva  
**Sent:** Monday, June 06, 2016 12:45 PM  
**To:** d'Almeida, Carolyn K. <[dAlmeida.Carolyn@epa.gov](mailto:dAlmeida.Carolyn@epa.gov)>; Wayne Miller <[Miller.Wayne@azdeq.gov](mailto:Miller.Wayne@azdeq.gov)>  
**Subject:** arsenic injection

Got a question for you two –

Amec's plan is to inject 320 gm/l of sodium sulfate, that has 3 mg/kg arsenic. By my calculations that is 0.96 mg/l of arsenic going into the ground, while the drinking water standard is 0.01 mg/l. How can they be allowed to do that?

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